

Exhibit 6

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July 31, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: In re: General Motors LLC Ignition Switch Litigation,
14-MD-2543 (JMF)**

Dear Judge Furman:

Pursuant to this Court's Order No. 8 § V, Lead and Liaison Counsel and counsel for General Motors LLC ("New GM") submit this joint written update to advise the Court of matters of possible significance in proceedings related to MDL 2543.

First, a trial date has been set for **August 24, 2015** in *Felix, et al. v. Gen. Motors LLC*, No. 1422-CC09472 (City of St. Louis, Mo.). The Honorable Mark Neill (314-622-4802) has been assigned as trial judge. A copy of the docket entry for the trial setting is attached hereto as Exhibit 1. New GM will shortly request a continuance and will seek plaintiffs' cooperation in that regard. New GM will update the Court promptly of any developments in *Felix*.

Second, on July 16, 2015, the Honorable Jeffrey Sauter entered the MDL 2543 Coordination Order ("Coordination Order") in *Hellems v. Gen. Motors LLC*, No. 15-459-NP (Eaton County, Mich.), a personal injury action alleging ignition switch defects in a 2001 Cadillac DeVille. A copy of the order is attached hereto as Exhibit 2.

Third, on July 16, 2015, plaintiff filed motions to amend the complaint and to set a trial date in *Stidham v. Gen. Motors LLC*, No. 14-CI-00177 (Leslie County, Ky.), a personal injury action alleging ignition switch defects in a 2007 Chevrolet Cobalt. Plaintiff's motion for trial setting does not specify a proposed trial date. Copies of plaintiff's motions are attached hereto as Exhibits 3-4, respectively. The Honorable Oscar Gayle House will hear argument on the motions on **September 2, 2015**.

Fourth, on July 17, 2015, the Honorable Vincent Borne entered the Coordination Order in *Fuselier v. Gen. Motors LLC*, No. 128349-C (St. Mary Parish, La.), a personal injury action

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alleging ignition switch defects in a 2005 Chevrolet Cobalt. A copy of the order is attached hereto as Exhibit 5.

Fifth, on July 17, 2015, New GM filed a motion for leave to amend its notice of removal and its answer in *Pillars v. Gen. Motors LLC*, No. 1:15-cv-11360 (E.D. Mich.), a Pre-Closing wrongful death action alleging airbag defects in a 2004 Pontiac Grand Am. Such leave was requested because the original pleadings inadvertently quoted language from the Amended Master Sale and Purchase Agreement approved by the Bankruptcy Court that had been superseded by a First Amendment. The error was the subject of Judge Gerber's July 16, 2015 oral ruling on plaintiff's No Stay Pleading; a written order was entered on July 29, 2015. Copies of New GM's motion, plaintiff's response, and New GM's reply are attached hereto as Exhibits 6-8, respectively. Copies of Judge Gerber's order and accompanying transcript from the July 16, 2015 hearing are attached hereto as Exhibit 9.

Sixth, on July 20, 2015, the Honorable Michael Garrett entered a scheduling order setting trial for Spring 2017 in *Grant (Charon) v. Gen. Motors LLC, et al.*, No. 2014CV02570MG (Clayton County, Ga.), a personal injury action alleging ignition switch defects in a 2004 Cadillac SRX. A copy of the order is attached hereto as Exhibit 10.

Seventh, on July 24, 2015, New GM's co-defendant filed a response consenting to entry of the Coordination Order in *Quiles v. Catsoulis, et al.*, No. 702871/14 (Queens County, N.Y.), which was a subject of the parties' July 17, 2015 joint letter to the Court (*see* Doc. No. 1194). Insofar as plaintiff previously consented to coordination, New GM's motion is now unopposed and briefing on the motion is complete. A copy of the response is attached hereto as Exhibit 11. The motion is set for submission before the Honorable Howard Lane on **August 5, 2015**.

Eighth, on July 24, 2015, counsel for plaintiff executed the MDL Protective Order in *Gilbert v. Gen. Motors LLC, et al.*, No. 140500140 (Philadelphia County, Pa.), a personal injury action alleging ignition switch defects in a 2010 Chevrolet Cobalt and in which New GM's unopposed motion for entry of the Coordination Order was previously denied (*see* Doc. No. 978). A copy of the executed order is attached hereto as Exhibit 12.

Ninth, on July 28, 2015, plaintiff filed a motion to set a trial date in *Goins v. Gen. Motors LLC, et al.*, No. 2014-CI40 (Yazoo County, Miss.), a wrongful death and personal injury action alleging ignition switch defects in a 2006 Saturn Ion. Plaintiff has requested trial to be set as early as possible after December 1, 2015. A copy of the motion is attached hereto as Exhibit 13.

Tenth, on July 29, 2015, the parties filed a consent motion for entry of the Coordination Order in *Popwell v. Gen. Motors Co., et al.*, No. 03-CV-2014-90170.00 (Montgomery County, Ala.), an individual economic loss action alleging ignition switch defects in a 2010 Chevrolet

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Cobalt, which was a subject of the parties' July 2, 2015 joint letter to the Court (*see* Doc. No. 1120). A copy of the motion is attached hereto as Exhibit 14.

Eleventh, on July 30, 2015, the parties filed a joint status report in *State of Arizona v. Gen. Motors LLC*, No. CV2014-14090 (Maricopa County, Ariz.). A copy of the status report is attached hereto as Exhibit 15.

Twelfth, in addition to the *Pillars* order described above, the following filings were made and orders entered related to proceedings in the Bankruptcy Court since the parties' July 17, 2015 joint letter to the Court (*see* Doc. No. 1194):

- July 20, 2015: Plaintiff in *Phillips*, MDL No. 1:14-cv-08540, filed a statement of issues and designation of record on appeal in connection with the Bankruptcy Court's Judgment dated June 1, 2015, and its April 15, 2015 Decision. Also, New GM filed a letter with the Bankruptcy Court advising it of communications with this Court related to the bankruptcy proceedings.
- July 22, 2015: The Bankruptcy Court entered a Decision and Order on the *Bledsoe* Plaintiffs' Reargument and Other Post-Judgment Motions.
- July 23, 2015: Designated Counsel filed with the Bankruptcy Court a proposed Stipulation and Agreed Order Tolling Certain of the Ignition Switch Plaintiffs' No Strike Pleading with Regard to the Second Amended Consolidated Complaint; and the Non-Ignition Switch Plaintiffs' (i) Objection Pleading with Regard to the Second Amended Consolidated Complaint and (ii) GUC Trust Asset Pleading and the Amended Reservation of Rights of Certain Non-ISD Pre-Closing Accident Plaintiffs ("GUC Trust Asset Pleading Stipulation"). Also, New GM filed its Response By General Motors LLC To The Ignition Switch Plaintiffs' No Strike Pleading With Regard To The Second Amended Consolidated Complaint; And The Non-Ignition Switch Plaintiffs' Objection Pleading With Regard To The Second Amended Consolidated Complaint. New GM also filed with the Second Circuit a letter with respect to the pending petitions and cross-petitions seeking a direct appeal to that Court of the Judgment dated June 1, 2015, informing it of, among other things, the Bankruptcy Court's *Bledsoe* Decision. Further, counsel for the *Bledsoe* plaintiffs filed a letter with the Second Circuit informing it of the Bankruptcy Court's *Bledsoe* Decision.
- July 28, 2015: The Bankruptcy Court entered the GUC Trust Asset Pleading Stipulation. In addition, the *Groman* plaintiffs filed with the Second Circuit a motion to intervene in the appeals of the Judgment.

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- July 29, 2015: Cross-Plaintiff in *Gable, et al. v. Walton, et al.*, No. 6737 (Lauderdale County, Tenn.), filed a reply brief in support of her No Strike Pleading.

Copies of the foregoing documents are attached hereto as Exhibits 16–25, respectively.

Thirteenth, pursuant to Order No. 1 § X.8, the Defendants’ July 21, 2014 Status Letter (Doc. No. 73) included an Exhibit A listing cases consolidated to date in MDL 2543, as well as an Exhibit B listing related cases pending in state and federal court, together with their current status. For the Court’s convenience, updated versions of Exhibits A and B are attached hereto as Exhibit 26.

Finally, the parties continue to work to ensure that the Court is provided with current and correct contact information for presiding judges in actions listed in the aforementioned Exhibit B. To that end, the Federal/State Liaison Counsel intends to shortly submit to the Court updates, if any, to the e-mail addresses of the presiding judges in Related Actions.

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: The Honorable Robert E. Gerber
MDL Counsel of Record